

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
BOSTON
HOUSTON
DALLAS
FORT WORTH
AUSTIN

DuaneMorris®

FIRM and AFFILIATE OFFICES

ERIC R. BRESLIN
DIRECT DIAL: +1 973 424 2063
PERSONAL FAX: +1 973 556 1552
E-MAIL: ERBreslin@duanemorris.com

www.duanemorris.com

HANOI
HO CHI MINH CITY
SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR

ALLIANCES IN MEXICO

August 15, 2024

VIA ECF

Hon. Arun Subramanian
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: Doe v. Gov't of the U.S. Virgin Islands, et al., No. 1:23-cv-10301-AS

Dear Judge Subramanian,

We represent Defendant Stacey Plaskett in this action. We write to move the Court for (1) an extension of time to file our reply on the motions to dismiss from August 21, 2024 to August 26, 2024, and (2) enlargement of the page limit from five to ten pages. Plaintiffs' counsel has consented to the extension of time, but has declined to consent to the enlargement of pages.

On May 13, 2024, Plaintiffs filed the 83 page Second Amended Complaint claiming violations of the Trafficking Victims' Protection Act, civil RICO, and negligence. (ECF No. 103). On June 27, 2024, Ms. Plaskett timely file a motion to dismiss within the Court's proscribed page limits. (ECF No. 118). The Second Amended Complaint named Ms. Plaskett in every count, so the motion to dismiss addressed every single one and personal jurisdiction.

On August 14, 2024, Plaintiffs filed an omnibus opposition to all pending motions to dismiss. (ECF No. 148). Plaintiffs' combined filing with all memos and exhibits is 1,136 pages long. The memorandum of law alone is 83 pages long. Ms. Plaskett has just seven days and five pages to reply.

Ms. Plaskett respectfully requests and additional five pages to reply to Plaintiff's lengthy and involved motion to dismiss, giving her ten pages to address personal jurisdiction and five substantive counts. Plaintiffs' counsel has refused to give consent for this request.

DUANE MORRIS LLP A DELAWARE LIMITED LIABILITY PARTNERSHIP

DAVID A. SUSSMAN, RESIDENT PARTNER

ONE RIVERFRONT PLAZA, 1037 RAYMOND BLVD., SUITE 1800
NEWARK, NJ 07102-5429

PHONE: +1 973 424 2000 FAX: +1 973 424 2001

Duane Morris

Hon. Arun Subramanian
August 15, 2024
Page 2

Ms. Plaskett also respectfully requests an additional four days to respond. Digesting the sheer volume of Plaintiffs' opposition papers will likely consume the entirety of this weekend. An additional four days will afford the defense an extra weekend to finalize briefing and fully consult with the client. Plaintiffs' counsel has advised that they consent to the request for additional time.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Eric R. Breslin
Eric R. Breslin

cc: All Counsel of Record (via ECF)